

Ron J.



Mel Carnahan, Governor • Stephen M. Mahfood, Director

## DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

APR 13 1999

Mr. Jack Klaus  
Kansas City Health Department  
Air Quality Section  
2400 Troost, Suite 3000  
Kansas City, MO 64108

Re: Inquiry About Applicability of 10 CSR 10-2.210, *Control of Emissions From Solvent Metal Cleaning*

Dear Mr. Klaus:

This letter is in response to your email to Randy Raymond dated March 17, 1999 in which you question the applicability of the above noted rule to a small "sink-style" cold degreaser using a cleaning product containing 3% methanol and trace amounts of propylene glycol and t-butyl ether. You specifically asked whether or not the small quantity of volatile organic compound (VOC) triggers applicability.

Air Pollution Control Program staff discussed your question and determined that the rule does apply in this situation. The rule applies to installations which emit VOCs from solvent metal degreasing operations, from processes which use cold cleaners, open-top vapor degreasers or conveyorized degreasers using nonaqueous solvents. The cleaning agent you describe contains, and therefore emits, VOCs. Additionally, the rule contains no definition of "nonaqueous", i.e., there is no defined threshold level of VOC that triggers applicability. Therefore, any amount of VOC in a cleaning agent will trigger applicability of this rule. However, the level of control for cold cleaners is partially dependent on solvent volatility.

The applicability of the rule to small parts washers and "remote reservoir" type cleaners (i.e., "sink-style") was previously established by a clarification letter addressed to your agency dated November 30, 1995 (see enclosed.)

If you have any questions, please contact Steve Feeler or Abbie Stockett at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Roger D. Randolph  
Director

RDR:lct

Enclosure